

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

THE UNITED STATES OF AMERICA
ex rel. JULIE LONG,

Plaintiffs,

v.

JANSSEN BIOTECH, INC.,

Defendant.

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) Civil Action No. 16-12182-FDS
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**PLAINTIFF-RELATOR’S MOTION FOR LEAVE TO FILE
DOCUMENTS UNDER SEAL IN ACCORDANCE WITH PROTECTIVE ORDER**

Plaintiff-relator Julie Long hereby requests permission to file under seal Exhibits 1 and 4 through 17 (“Exhibits”) that are being submitted in support of Plaintiff-Relator’s Memorandum of Law in Support of Motion to Compel Full Disclosure of Legal Assessments and Advice Regarding the Lawfulness of Providing the Infusion Business Support and Consultative Services at Issue for the following reasons:

1. The Protective Order governing this action requires that if a party wishes to use documents or information that have been designated as “Confidential Material” or “Confidential Material – Attorneys Eyes Only” in any papers filed with the Court and wishes for the Court to review such documents or information, the filing party is required to file the papers under seal, and the papers are to remain sealed until further order of the Court. *See* Protective Order (ECF 103) at § VIII.B.

2. The Exhibits contain information and documents that defendant Janssen Biotech, Inc., has designated as “Confidential Material” or “Confidential Material – Attorneys Eyes Only” pursuant to the Protective Order.

Plaintiff respectfully requests that the Court grant Plaintiff permission to file the Exhibits under seal.

Dated: January 24, 2024

Respectfully submitted,

/s/ Casey M. Preston

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CERTIFICATE OF SERVICE

I hereby certify on this 24th day of January, 2024, that this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

/s/ Casey M. Preston
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